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U.S. DISTRICT COURT
MID. DIST. TENN.

In The United States District Court
For The Middle District Of Tennessee

Michael W. Ingram

Plaintiff

vs.

Civil Action NO.

3:09 - 0037

ABL Management Inc

Venestine Dulin

Jerry Mathis, SR.

Vicky Jenkins

Richard Eytchison

Dana Akins

Babette Lanus

Defendants

Judge's, Trauger/Knowles

Motion to Respond Against Defendants Motion
for Their Summary Judgment.

"Reasons and proof" Against as to why the Defendants
Should not be granted the Summary Judgment.

1.) I have a Jail Incident Report Dated for 6/02/09
That will show where ABL Management, Inc. and staff workers
refused to feed me Lunch on this day. In the ABL
"Collective Exhibit 3" sent to me on 11-02-09,

where the Plaintiffs signed receipt for meals from Feb - Oct 2009, Bates Nos. 00359 - 00946 But not to exclude Bates Nos. 00972 - 11115 For Added diet sheets that Plaintiff had to sign proving I recieved my meals. In these Bate's No's of signed Diets sheets, the court will see the Dates That I the Plaintiff was in fact "Not Fed". Dates Like.

- (A) 3-29-09 Lunch
- (B) 4-06-09 Dinner & Lunch
- (C) 4-07-09 Breakfast
- (D) 4-21-09 Breakfast & Lunch
- (E) 5-14-09 Lunch
- (F) 6-02-09 Lunch (Falsified Document shown)
- (G) 9-04-09 Dinner
- (H) 10-23-09 Lunch & Dinner
- (I) 10-27-09 Lunch

ABL Management Inc, Staff here at C.J.C, Nashville Tennessee would tell Austin Bodie the Jail Administrator that I was in fact eating, Signing and/or recieved my meals when in fact I was not. ABL can not produce these Documents Unless falsifying like 6-02-09 was falsified for and to show Mr Bodie some type of Document. You can see Falsifying of the Document as well you can hold it up to the light and line everything up.

The Jail Incident Report is marked Exhibit 1. and the ABL Collective Exhibit 3 will be the Plaintiff's Exhibit 2.

2.) I have a "Jail Contact Log Report" That will be marked As Exhibit 3 that will show the court that I had trouble out of ABL Management Inc and staff over and over serving me the same "Un-Nutritious" meals that Lacked the "Nutrients" Needed to survive without sickness and headaches for good Health.

Exhibit 3 will only help to prove this above and to also show the courts the Officers (witnesses) that ABL Management Inc and staff kepted serving me Beans. Exhibit 3 will also use Defendants Exhibit 4 Bates No's 00948-00961 to show that I the Plaintiff. Was in fact not getting the "Nutritious" meals like ABL Management Inc says.

3.) Copys of the Inmate Grievance Reports will show and prove that I complained of Rice and Beans all the time, food served cold to me, Not the right amount of Grams of food, Low or no protein most of the time, will also show the court where the C.J.C. Staff told and complained to the C.J.C. "Lieutenant" that my meals were a "constant Daily Issue" Dealing with ABL's mistakes. This will be Marked

as Exhibit 5 for all the Inmate Grievance Reports and Responses.

4.) Exhibit 6 is a response from the C.C.J. Jail Administrator Austin Bodie agreeing with me that the ABL Management Inc and the staff issues are a constant problems. 9 Grievances all (sustained) Yet the problems still to this day continue.

5.) Exhibit's No. 7 is a Lawsuit page showing the Sutes against ABL Managment Inc. however, This is not all the Suites against them.

6.) Exhibit 8 is an add from the Tennessean News paper where the Public ^{was} informed of the ruling Judge Todd Campbell made to have an inmate moved because of the food service Provider ABL Management, Inc.

7.) Exhibit 9 is ~~the~~ Ruling handed down from Fedral Judge Todd Campbell that will prove and only back up my case for the way ABL Managment Inc. has been treating me.

8.) Exhibit 10 and Exhibit 11 are provided by the Correct Care Solutions (C.C.S.) here at C.J.C. and it shows where even they have known that I was a Vegetarian and allergic to beans since my stay here at C.J.C.

9.) Exhibit 12 is just a few copy of the Fraudulent Action that goes on in the ABL Management Inc kitchen here at C.J.C.

Respectfully Submitted
Michael W. Long

A copy of this motion was also sent via U.S. Mail to:

Paul R. Zeitner
801 Broad Street, Third Floor
Chattanooga TN 37402